

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 12, 1997

Alec Poitevint, Treasurer
Republican National Committee-RNC
310 First Street SE
Washington, DC 20003

Identification Number:

C00003418

Reference:

Year End Report (11/26/96-12/31/96)

Dear Mr. Poitevint:

On May 7, 1997, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your June 6, 1997 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your response states your committee has one line of credit with Signet Bank which you have made numerous draws against. You also state you do not treat each draw as a separate loan. The following paragraph outlines the correct method for reporting a line of credit.

After the initial terms of the credit line are disclosed, the credit line should be reported on Schedules A and C as it is used. Each time the credit line is activated, the amount used should be reported on Line 13 of the Detailed Summary Page and itemized on Schedule A as a loan from the bank. A new Schedule C should be provided for each draw disclosing the incurred, date due, interest rate, original amount of the loan, cumulative payment and outstanding balance. Payments made on the credit line should be reported on Line 26 of the Detailed Summary Page, itemized on a supporting Schedule B as a loan repayment and disclosed on Schedule C.

Additionally, each time you draw on the line of credit, you should supply the Commission with an updated Schedule C-1.

Please file an amendment to your report providing a Schedule C disclosing each draw on the line of credit as a new loan.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s); Event Costs. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3). The Commission notes you have started a new policy to use more specific descriptions starting May 1, 1997; however, you should still provide more specific descriptions on this report.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Amy Reynolds on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division